

Denise Bourgeois Haley
Attorney at Law: 143709
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel: (562)437-7006
Fax: (562)432-2935
E-Mail: rohlfig.office@rohlfiglaw.com
Attorneys for Plaintiff
CLARESSA LAVOIE BLACK

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

CLARESSA LAVOIE BLACK)	Case No.: 1:20-cv-01166-EPG
)	
Plaintiff,)	STIPULATION TO EXTEND TIME TO
v.)	FILE OPENING BRIEF
)	
KILOLO KIJAKAZI,)	(FIRST REQUEST)
Acting Commissioner of Social Security,)	
)	
)	
Defendant.)	
_____)	

Plaintiff Claressa Lavoie Black and Defendant Kilolo Kijakazi, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time from December 1, 2021 to February 7, 2022 for Plaintiff to file an Opening Brief, with all other dates in the Court's Scheduling order extended accordingly.

This is Plaintiff's first request for an extension. This request is made at the request of Plaintiff's counsel to allow additional time to fully research the issues presented. This request is made at the request of Plaintiff to allow additional time to fully research the issues presented. Plaintiff's counsel has not been able to address this motion because schedule has been highly impacted by the convergence of her own covid and post covid slow recovery and the resulting backlog with the release of transcripts and lifting of stays. Counsel returned to work in a limited capacity in September with 13 to 14 motions due for September, October November, now December and January. Counsel can only do one motion at a time to the best of her ability.

Counsel has worked diligently and zealously for her client and has had to continue motions. Counsel has taken herself off the assignment wheel as of her illness. Other attorneys have taken a few cases; however, they too are impacted by the lifting of stays. If counsel could do this motion now, she would; however, counsel must respectfully request continuance of this motion to a date and time where completion is likely. Counsel respectfully makes this request in good faith.

DATE: November 29, 2021 Respectfully submitted,

LAWRENCE D. ROHLFING

/s/ Denise Bourgeois Haley

BY: _____
Denise Bourgeois Haley

Attorney for plaintiff Ms. Claressa Lavoie Black

DATE: November 29, 2021

PETER K. THOMPSON
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel
Social Security Administration

/s/ Chantal R. Jenkins

BY: _____
Chantal R. Jenkins
Special Assistant United States Attorney
Attorneys for defendant Kilolo Kijakazi,
Acting Commissioner of Social Security
[*authorized by e-mail]

ORDER

Pursuant to the parties' stipulation (ECF No. 20), IT IS HEREBY ORDERED that Plaintiff shall file and serve an opening brief no later than February 7, 2022. All subsequent deadlines are extended accordingly.

IT IS SO ORDERED.

Dated: **December 3, 2021**

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE